

Page 1 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

**DISCRIMINATION  
COMPLAINT FORM  
to the  
United States Department  
of Education Office for  
Civil Rights**

1. Name of person filing this complaint:

**Last Name, First, Middle**

Swain, Lauren

**Address:**

8532 N. Ivanhoe St., #208

**City, State, Zip Code:**

Portland, OR 97203

**Home/Work Telephone:**

[REDACTED]

**Email Address:**

lauren@paulsouthwick.com

2. Name of person discriminated against (if **other** than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent or legal guardian is required.

**Last Name, First, Middle**

Lord, Jamie

**Address:**

[REDACTED]

**City, State, Zip Code:**

**Home/Work Telephone:**

**Email Address:**

3. OCR investigates discrimination complaints against institutions and agencies which receive funds from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

**Name of Institution:**

Regent School of Law

**Address:**

1000 Regent University Drive,  
RH 255L

**City, State, Zip Code:**

Virginia Beach, VA, 23464

**Department/School:**

School of Law

Page 2 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, age or retaliation. Please indicate the basis of your complaint:

☐ Discrimination **based on sex (specify)**

Discrimination on the basis of sexual orientation.

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

Although Regent representative told Jamie before she enrolled that being a lesbian was not a problem for the school, after she became a student, Regent officials warned Jamie that she could be expelled for "premarital sex" because she is in a lesbian relationship or if she were to bring her girlfriend on campus. A professor harassed Jamie because of her sexual orientation and repeatedly condemned and insulted LGBT people in class. Regent did not respond to Jamie's complaints about the professor's behavior.

Regent's student handbook contains the following: "Sexual misconduct that is prohibited includes disorderly conduct or lewd, indecent, or obscene conduct or expression, involvement with pornography, premarital sex, adultery, homosexual conduct or any other conduct that violates Biblical standards."

6. What is the most **recent date** you were discriminated against?

Date: Current, Ongoing

7. If this date is **more than 180 days ago**, you may request a waiver of the filing requirement.

X I am requesting a waiver of the 180-day time frame for filing this complaint.

Please explain why you waited until now to file your complaint.

1) the Covid-19 pandemic;  
2) The Trump administration's policies and statements about religious exemptions to Title IX;

Page 3 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination  
Complaint Form, Consent Form, and Complaint Processing Procedures

3) The Trump administration's policies and statements about Title IX not prohibiting discrimination on the basis of sexual orientation or gender identity.

4) Although the initial act of discrimination took place more than 180 days ago, Jamie's complaint should not be considered time-barred because Regent continues to discriminate against Jamie and to promulgate policies and practices that discriminate against LGBTQ+ students.

8. Have you attempted to resolve these allegations with the institution through an internal grievance procedure, appeal or due process hearing?

**Yes**

If you answered **yes**, please describe the allegations in your grievance or hearing, identify the date you filed it, and tell us the status. If possible, please provide us with a copy of your grievance or appeal or due process request and, if completed, the decision in the matter.

Jamie attended many classes at Regent where professors described LGBTQ+ people as pedophiles, child molesters, undeserving of marriage, and as destined for hell. Jamie reported these incidents to Regent administration but the administration took no action.

9. If the allegations contained in this complaint have been filed with any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

**Agency or Court:** U.S. District Court - District of Oregon - Eugene Division

**Date Filed:** 03/29/21

**Case Number or Reference:** 6:21-cv-00474-AA

**Results of Investigations/Findings by Agency or Court:**  
Pending

10. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information **is not required**, but it will be helpful to us.

Not applicable

Page 4 of 4 – U.S. Department of Education, Office for Civil Rights Discrimination Complaint Form, Consent Form, and Complaint Processing Procedures

11. What would you like the institution to do as a result of your complaint — what remedy are you seeking?

Jamie would like Regent's policies amended to state that (1) same-sex dating relationships and displays of affection will be treated by Regent in the same manner as opposite-sex dating relationships and displays of affection; (2) students will not be punished for coming out as LGBTQ+ or for expressing their sexual or gender identity (through pronouns, clothing, hair, makeup, etc.); (3) Regent will not encourage or facilitate conversion therapy or any other sexual or gender orientation change efforts; (4) students who report sexual or physical assault will be granted safe harbor from discipline relating to sexual activity or other code of conduct violations; and (5) Regent's non-discrimination policy includes sexual orientation and gender identity as applied to all aspects of Regent, including housing and other programs.

12. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.

07/24/21

(Date)

Jul 24, 2021

(Date)



(Signature)

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(Signature of person in Item 2)





UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE FOR CIVIL RIGHTS

400 MARYLAND AVENUE, SW  
WASHINGTON, DC 20202-1475

REGION XI  
NORTH CAROLINA  
SOUTH CAROLINA  
VIRGINIA  
WASHINGTON, DC

May 24, 2022

Ms. Lauren Swain  
Paul Southwick Law, LLC  
8532 N. Ivanhoe Street, #208  
Portland, OR 97203

*By email only to:* lauren@paulsouthwick.com

*Re:* Regent University  
OCR Case No. 11-21-2233

Dear Ms. Swain:

On July 28, 2021, the United States Department of Education's Office for Civil Rights (OCR) received your complaint against Regent University, particularly its School of Law. You filed the complaint on behalf of a student at the University, whom we will refer to as the Student, and on behalf of other current LGBTQ+ students at the University. You allege that the University discriminates on the basis of sexual orientation. Specifically, you allege that:

1. The University discriminates against LGBTQ+ students because its policies and practices, including in its current Student Handbook, prohibit students from engaging in homosexual conduct (Allegation 1); and
2. The University discriminated against the Student, because she is a lesbian, when:
  - a. During the 2020-2021 academic year, the Student's Constitutional Law professor, whom we will refer to as the Professor, made disparaging remarks about the Student's sexual orientation and LGBTQ+ individuals and communities (Allegation 2.a); and
  - b. The University failed to respond to the Student's reports, made during the Spring 2021 semester, regarding the Professor's remarks (Allegation 2.b).

OCR enforces Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. § 1681 *et seq.*, and its implementing regulation at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex in any education program or activity operated by a recipient of federal financial assistance from the Department. As a recipient of financial assistance from the Department, the University is subject to Title IX.

OCR is opening the complaint for investigation because OCR has determined that it has jurisdiction, that the complaint was timely filed, and that it is appropriate for investigation under the laws and regulations enforced by OCR. If you disagree with the way OCR stated the allegations, please contact the OCR staff person identified below within 10 days of the date of

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Page 2 – Letter of Notification – Complainant – OCR Case No. 11-21-2233

this letter. Please note that opening the complaint for investigation in no way implies that OCR has made a determination with regard to its merits. During the investigation, OCR is a neutral fact-finder, collecting and analyzing relevant evidence from you, the University, and other sources, as appropriate. OCR will ensure that its investigation is legally sufficient and fully responds to the allegations in accordance with the provisions of Article III of OCR's *Case Processing Manual* (CPM), available at <https://www2.ed.gov/about/offices/list/ocr/docs/ocrcpm.pdf>. In accordance with the CPM, OCR will provide a copy of the complaint to the University. OCR would like to make you aware that individuals who file complaints with OCR may have the right to file a private suit in federal court whether or not OCR finds a violation.

Please be advised that the University must not harass, coerce, intimidate, discriminate, or otherwise retaliate against an individual because that individual asserts a right or privilege under a law enforced by OCR or files a complaint, testifies, assists, or participates in a proceeding under a law enforced by OCR. If this happens, the individual may file a separate retaliation complaint with OCR.

Under the Freedom of Information Act (FOIA), it may be necessary to release this document and related correspondence and records upon request. If OCR receives such a request, we will seek to protect, to the extent provided by law, personally identifiable information that could reasonably be expected to constitute an unwarranted invasion of personal privacy if released.

If you have any questions or concerns, please contact Abony Alexander, the OCR attorney assigned to this complaint, at [abony.alexander@ed.gov](mailto:abony.alexander@ed.gov).

Sincerely,



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2022.05.24 10:07:47  
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Letisha Morgan-Cosic  
Team Leader